

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**UNITED STATES OF AMERICA**

**v.**

**ENRIQUE ROBERTO “HENRY”  
CUELLAR and IMELDA RIOS  
CUELLAR,**

**Defendants.**

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**No. 4:24-cr-224**

**AGREED MOTION FOR PROTECTIVE ORDER  
CONCERNING CLASSIFIED INFORMATION**

The United States of America moves for a protective order concerning the disclosure and dissemination of classified national security information under Federal Rules of Criminal Procedure 16 and 57, § 3 of the Classified Information Procedures Act (CIPA), 18 U.S.C. app. 3, the Revised Security Procedures established by the Chief Justice of the United States under CIPA § 9(a), and the Court’s inherent supervisory authority.

Counsel for defendant Enrique “Henry” Cuellar have represented that they do not oppose the attached proposed protective order and that this motion for entry of the proposed order is an agreed motion.

The government therefore respectfully requests that the Court enter the attached protective order.

Dated: January 31, 2025

Respectfully submitted,

JOHN D. KELLER  
Acting Chief, Public Integrity Section  
Criminal Division  
U.S. Department of Justice

JENNIFER KENNEDY GELLIE  
Chief  
Counterintelligence and Export Control Section  
National Security Division  
U.S. Department of Justice

By: /s/ Marco A. Palmieri  
Marco A. Palmieri  
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Attorneys for the United States

By: /s/ Garrett Coyle  
Garrett Coyle  
Attorney for the United States

**CERTIFICATE OF SERVICE**

I certify that I filed this motion via the CM/ECF system on January 31, 2025, which caused the motion to be electronically served on all counsel of record.

/s/ Garrett Coyle  
Garrett Coyle